

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

PLAINVILLE GENERATING CO., LLC,

*Plaintiff,*

V.

DTE BIOMASS ENERGY, INC. and  
PLAINVILLE GAS PRODUCERS, INC.,

*Defendants.*

CIVIL ACTION  
NO. 05-1121- GAO

**MOTION OF WESLEY S. CHUSED FOR LEAVE TO PERMIT  
APPEARANCES OF W.C. BLANTON AND LORI J. SELLERS  
*PRO HAC VICE* FOR DEFENDANTS**

Wesley S. Chused, attorney for the Defendants, DTE Biomass Energy, Inc. and Plainville Gas Producers, Inc. (“Defendants”), pursuant to Local Rule 83.5.3, hereby moves for leave to permit the appearance of attorney W.C. Blanton and Lori J. Sellers of Kansas City, Missouri on behalf of the Defendants, *pro hac vice*, in this action. In support of this Motion, Wesley S. Chused states as follows:

1. I am a member in good standing of the Bar of this Court and I am counsel of record for the Defendants in this action.
2. The certificates of W.C. Blanton and Lori J. Sellers, filed concurrently herewith, show that (i) they are members of the Bar in good standing in every jurisdiction where they have been admitted to practice; (ii) there are no disciplinary proceedings pending against them as a

member of the Bar in any jurisdiction; and (iii) they are familiar with the Local Rules of the United States District Court for the District of Massachusetts.

3. Mr. Blanton and Ms. Sellers are experienced trial lawyers, they are particularly familiar with the facts and law relevant to the Defendants' defenses in this action and they are best suited to represent the Defendants' interests in this case.

WHEREFORE, Wesley S. Chused prays that the Court grant this Motion to allow W.C. Blanton and Lori J. Sellers to appear *pro hac vice* on behalf of Defendants, DTE Biomass Energy, Inc. and Plainville Gas Producers, Inc., in this action.

**LOCAL RULE 7.1(A)(2) CERTIFICATION**

The undersigned counsel for Defendants hereby certifies that he has conferred with Plaintiff's counsel in good faith to resolve or narrow the issue herein.

July 20, 2005

/s/ Wesley S. Chused  
Wesley S. Chused (BBO #083520)  
LOONEY & GROSSMAN LLP  
101 Arch Street  
Boston, MA 02110  
(617) 951-2800

CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2005, I served a copy of the foregoing pleading upon all parties hereto electronically, via facsimile or by mailing copies thereof, via first class mail, postage prepaid, properly addressed to:

Steven Ferrey, Esq.  
Christopher L. DeMayo, Esq.  
LeBoeuf, Lamb, Greene & MacRae, L.L.P.  
260 Franklin Street  
Boston, MA 02110  
(617) 748 6800

/s/ Wesley S. Chused

Wesley S. Chused